

## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

DANIEL WILLIAMS,

Plaintiff,

v.

HASSAN M. AHMED et al.,

Defendants,  
and

SONUS NETWORKS, INC.,

Nominal Defendant.

CIVIL ACTION NO.  
04-CV-10359 DPW

FILING FEE PAID:  
 RECEIPT # 54914  
 AMOUNT \$ 50.00  
 BY DPTY CLK  
 DATE 3/30/04

**PLAINTIFF'S MOTION FOR  
ADMISSION PRO HAC VICE -ASSENTED TO**

Pursuant to Rule 83.5.3 (b) of the Local Rules of the United States District Court for the District of Massachusetts, the undersigned, a member in good standing of the Bar of the Commonwealth of Massachusetts and the United States District Court for the District of Massachusetts, hereby moves to grant permission for William B. Federman, Esq. of the law firm of Federman & Sherwood, 120 N. Robinson Avenue, Suite 2720, Oklahoma City, Oklahoma 73102, to appear *pro hac vice* on behalf of the plaintiff Daniel Williams in this matter, and to permit him to participate in all matters, including any oral proceedings and trial in this action, which arise during the representation of plaintiff. As grounds for its motion, plaintiff states that:

1. Plaintiff has filed this shareholder derivative case seeking damages and injunctive relief, alleging that the defendants breached their fiduciary duties owed to the nominal defendant, Sonus Networks, Inc..
2. Attorney Federman is highly experienced in shareholder derivative actions and

therefore will provide significant assistance in the prosecution of this action.

3. Attorney Federman is a member in good standing of the bar of the State of Oklahoma and in every court in which he is admitted (see Affidavit of William B. Federman, Esq., attached hereto as Exhibit A).

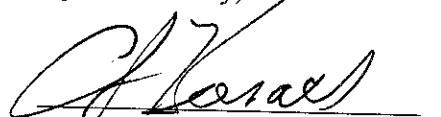
4. The State of Oklahoma grants like privileges to members of the bar, in good standing, of the Commonwealth of Massachusetts.

5. A proposed Order is attached as Exhibit B.

WHEREFORE, plaintiff Daniel Williams requests that this Court admit William B. Federman Esq. *pro hac vice*, pursuant to Local Rule 83.5.3(b).

Respectfully Submitted,  
Daniel Williams,  
Plaintiff,

By his attorney,

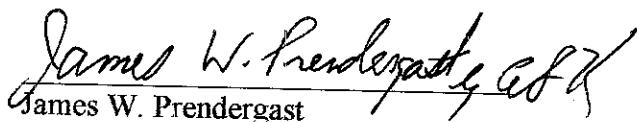


Alan L. Kovacs (BBO #278240)  
**Law Office of Alan L. Kovacs**  
2001 Beacon Street, Suite 106  
Boston, Massachusetts 02135  
(617)964-1177

Dated: March 26, 2004

ASSENTED TO:

On behalf of Defendants  
Hassan M. Ahmed et al.



James W. Prendergast  
Hale & Dorr LLP  
60 State Street  
Boston, MA 02109  
(617) 526-6000

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 26<sup>th</sup> day of March, 2004, a true copy of the foregoing Motion of Plaintiff for Admission Pro Hac Vice, was served by mail, postage prepaid on all defense counsel of record.

